

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of )

The Development of Operational, Technical, and )  
Spectrum Requirements for Meeting Federal, State )  
and Local Public Safety Agency Communications )  
Requirements Through the Year 2010 )

WT Docket No. 96-86

To: The Commission

**REPLY COMMENTS OF THE FORESTRY-CONSERVATION  
COMMUNICATIONS ASSOCIATION**

The Forestry-Conservation Communications Association ("FCCA") hereby submits the following reply to comments filed in response to the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding, FCC 96-155, released April 10, 1996, in which Commission seeks comment on how to best fulfill the current and future needs of public safety communications.

FCCA is the Commission's certified Part 90 radio frequency coordinator for the Forestry-Conservation Radio Service. FCCA also represents its parent organizations, the National Association of State Foresters ("NASF") and the International Association of Fish and Wildlife Agencies ("IAFWA"), on matters related to radio communications. The members of NASF and IAFWA provide a full range of public safety related services, including fire protection, law enforcement, and emergency medical services over wide areas of state-owned and/or protected lands. Most of these agencies operate statewide radio systems utilizing land mobile radio spectrum. FCCA is also a member of the Public

Safety Communications Council ("PSCC"), whose membership consists of the public safety frequency coordinators, including the Association of Public-Safety Communications Officials-International ("APCO"), the International Municipal Signal Association and the International Association of Fire Chiefs ("IMSA/IAFC"), and the American Association of State Highway and Transportation Officials ("AASHTO").

FCCA recognizes the great need across the country by public safety organizations for new spectrum to satisfy their communications requirements. This is especially true with regard to FCCA's members, who require substantial amounts of additional state-wide spectrum to ensure the protection of lives and property. Therefore, FCCA fully supports the conclusions of the Public Safety Wireless Advisory Committee ("PSWAC") as summarized in the "Final Report." PSWAC concluded that public safety will require: (1) an immediate 2.5 MHz of spectrum for interoperability; (2) 25 MHz of new spectrum within 5 years; and (3) an additional 70 MHz of spectrum over the next fifteen years.<sup>1</sup>

With respect to the issue of achieving interoperability between public safety organizations, FCCA supports the Commission proposal to designate mutual aid channels. However, FCCA agrees with IMSA/IAFC that the Commission must not establish rules for mutual aid channel priority until after it designates the channels.<sup>2</sup> Assuming the channels are designated, FCCA believes that the rules governing its use should be developed with close participation by the above-mentioned members of the PSCC, along with the Commission and NTIA.

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<sup>1</sup> See Public Safety Wireless Advisory Committee, "Final Report," September 11, 1996.

<sup>2</sup> IMSA/IAFC Comments at 13.

FCCA also supports the IMSA/IAFC and APCO comments opposing the Commission's proposal to allow pre-coordination licensing procedures.<sup>3</sup> The Commission should not permit this type of licensing system. Licensing before frequency coordination has not been tested, and little is known about the concept. It appears that this type of system would likely be much less efficient than the current licensing process as back-and-forth changes would have to be made to a license and/or coordination before the final parameters of a license could be determined. Therefore, post-licensing coordination would appear to be a disservice to spectrum users.

FCCA specifically endorses AASHTO's comments regarding the setting aside of channels for state-wide radio operations.<sup>4</sup> City and county agencies can effectively reuse designated frequencies, while state agencies such as many of FCCA's members require state-wide systems, frequencies for which are difficult to reuse.

FCCA also applauds APCO's efforts with regard to Project 25. This standard offers opportunities for medium to large communities or state supported systems that have adequate funding to finance a system. FCCA feels that, at this time, funding may be a problem for implementation of Project 25 technology and that the lack of full support by the manufacturing community makes interoperability across the country difficult to achieve. Nevertheless, FCCA is hopeful that these impediments will be overcome, leading to greater nationwide interoperability.

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<sup>3</sup> IMSA Comments at 23; APCO Comments at 27.

<sup>4</sup> See AASHTO Comments at 5.

For the reasons stated above and in the many comments filed by other public safety organizations and members, FCCA urges the Commission to act swiftly to satisfy the public safety spectrum requirements identified by PSWAC.

Respectfully submitted,

FORESTRY-CONSERVATION  
COMMUNICATIONS ASSOCIATION

By: 

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